



NATIONAL  
FISHERIES  
INSTITUTE

7918 Jones Branch Drive, Suite 700  
McLean, VA 22102  
703-752-8880  
703-752-7583(f)  
[www.nfi.org](http://www.nfi.org)

April 10, 2006

National Organics Standards Board (NOSB)

Attn: Ms. Valerie Frances  
Room 4008 – South Building  
1400 and Independence Avenue, SW  
Washington, DC 20230-0001

Via email to [NOSB.Livestock@usda.gov](mailto:NOSB.Livestock@usda.gov)

***Re: Final Report by the Aquaculture Working Group of the NOSB***

Dear Ms. Frances:

The National Fisheries Institute wishes to comment on several aspects of the report submitted by NOSB on Organic Standards for Farmed Aquatic Foods.

- ❖ NFI commends the work of the Aquaculture Working Group (AWG) for thorough deliberation of all aspects of farmed aquaculture and the completeness of the report. We regret that the NOSB has not yet addressed aquaculture of molluscan shellfish (comments submitted in a separate letter) nor aquaculture of wild-caught. NFI would be pleased to assist the NOSB and USDA in securing nominations for qualified individuals for Working Groups in these two important areas.
- ❖ NFI strongly supports the principle of sustainable fisheries. We suggest adding the term to the definitions in § 205.2. RE: [§ 205.252 (f)] The seafood producing community has the greatest stake in assuring the future of our fisheries. The assurance of sustainability is being addressed by other government authorities. It

is not the responsibility of the NOSB to determine if fisheries are sustainable, particularly when other government agencies are responsible for this activity. Further, several groups have created market mechanisms to certify fisheries as sustainable, so it is inappropriate for NOSB to single out any one group as credible or qualified to conduct certifications. Whichever groups conduct certifications, they should be consistent with FAO standards and eco-labeling guidelines.

- ❖ The following areas are those in which we ask for corrections and clarification:
  - **§ 205.251 (a) Origin of aquaculture animals.** The Explanation section provides a table titled **5% of Total Market Weight** which, in our opinion, adds little to the document as just general information versus a defined specific weight or a minimal weight at which organic management must begin. Specifications will limit broad individual interpretation. We offer 10% total market weight as more realistic for shrimp, catfish, tilapia, hybrid striped bass, redfish, and oysters.
  - **§ 205.251 (e) Use of Triploids.** We oppose restricting the use of triploid fish in organic aquaculture. Triploids do naturally occur in most fish populations and are not genetically modified organisms.
  - **§ 205.252 Aquaculture Feed. (f)** The last sentence of this section should read either, “. . . shall be recognized as in compliance with this requirement,” or “. . . shall be recognized as compliant with this requirement.” **(g) (2)** The second sentence should read, “The portions of processed wild fish. . . labeled as organic unless provided d elsewhere in this rule.”
  - **§ 205.252 Mammalian and Poultry Slaughter By-products.** We agree that the trade off of having to use synthetic amino acids are a case in point for using organic terrestrial animals as a feed source.
  - **§ 205.253 Aquaculture health care. (c) (1)** We agree that prophylactic use of antibiotics should be prohibited, however, we support use of approved compounds at appropriate levels consistent with international standards. We disagree that organic aquaculture products must not come from fish treated with antibiotics. Use of antibiotics should allow treatment with prolonged withdrawal periods.
  - **§ 205.255 Aquaculture facilities. (j)** The second sentence contains the word “preventative” which has rather eased its way into American English. The word should be replaced with the grammatically correct “preventive.”
  - **§ 205.259 Harvest, transport, post harvest handling, and slaughter of aquatic animals. (a) and (f)** contain language that reflects the view of animal rights groups that contend that fish have a nervous system developed sufficiently such that they can feel pain. Rather than getting into that argument, we suggest that the NOSB report address action steps in slaughter that will be determiners of food safety and quality of fresh fish.

Sincerely,

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Barbara Blakistone, Ph.D.  
Director, Technical and Regulatory Affairs  
National Fisheries Institute  
McLean, VA 22102  
703-752-8887 (office)

cc: Robert Collette, Vice President, Scientific and Technology, NFI  
John Connelly, President, NFI

*The National Fisheries Institute (NFI) is the nation's leading advocacy organization for the seafood industry. Its member companies represent every element of the industry from the fishing vessels at sea to the national seafood restaurant chains. From responsible aquaculture, to a marketplace supporting free trade, to ensuring consumers have the facts on the health benefits of fish and shellfish, NFI and its members support and promote sound public policy based on scientific research.*